

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT OF ILLINOIS
ST. CLAIR COUNTY

JOHN E. HOWELL, III,)
Plaintiff,)
vs.) CIVIL NO. 15-L- 494
GREEN MOUNT LAKES)
APARTMENTS, a corporation,)
Defendant.)



COMPLAINT

Now comes the Plaintiff, John E. Howell, III, by Brad L. Badgley, P.C., his attorney, and complaining of the Defendant, Green Mount Lakes Apartments, states:

1. On or about July 22, 2015, the Plaintiff, John E. Howell, III, a tenant, was walking down a flight of steps in a common area on property owned, operated and controlled by the Defendant, Green Mount Lakes Apartments, O'Fallon, Illinois. (Photographs of the steps is attached hereto as Exhibit "A").
2. At said time and place, the Plaintiff, John E. Howell, III, was caused to fall, when a step broke, as a proximate result, in whole or in part, of the negligence of the Defendant, Green Mount Lakes Apartments, to-wit:

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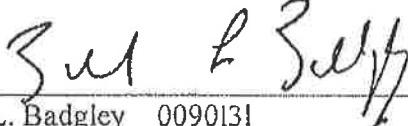


- a) Failed to warn the Plaintiff, John E. Howell, III, of the deteriorated concrete step;
- b) Failed to repair or replace the deteriorated concrete step;
- c) Failed to inspect the condition of the step.

3. As a further result of the foregoing, the Plaintiff, John E. Howell, III, sustained injuries to various parts of his body from all of which he has and in the future will suffer pain, permanent disability and disfigurement.

4. In addition thereto, the Plaintiff, John E. Howell, III, has and in the future will become obligated to expend money for medical expenses in an attempt to treat his aforesaid injuries and has lost wages he otherwise would have earned.

WHEREFORE, Plaintiff demands judgment against the Defendant in an amount in excess of \$50,000.00 and costs of suit.



Brad L. Badgley 0090131
Brad L. Badgley, P.C.
26 Public Square
Belleville, Illinois 62220
618-235-1000
618-235-1086 - fax
bbadg@aol.com

Attorney for Plaintiff
John E. Howell, III

AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222

STATE OF ILLINOIS)
)
 ss.
COUNTY OF ST. CLAIR)

Brad L. Badgley, being first duly sworn upon his oath, deposes and states pursuant to Supreme Court Rule 222(b) the total of money damages sought in the instant cause of action has a value in excess of \$50,000.00, exclusive of interest, costs and attorney's fees.

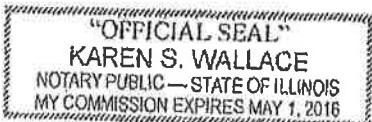
Further Affiant sayeth not.

Brad L. Badgley

Brad L. Badgley 0090131
Brad L. Badgley, P.C.
26 Public Square
Belleville, Illinois 62220
(618) 235-1000

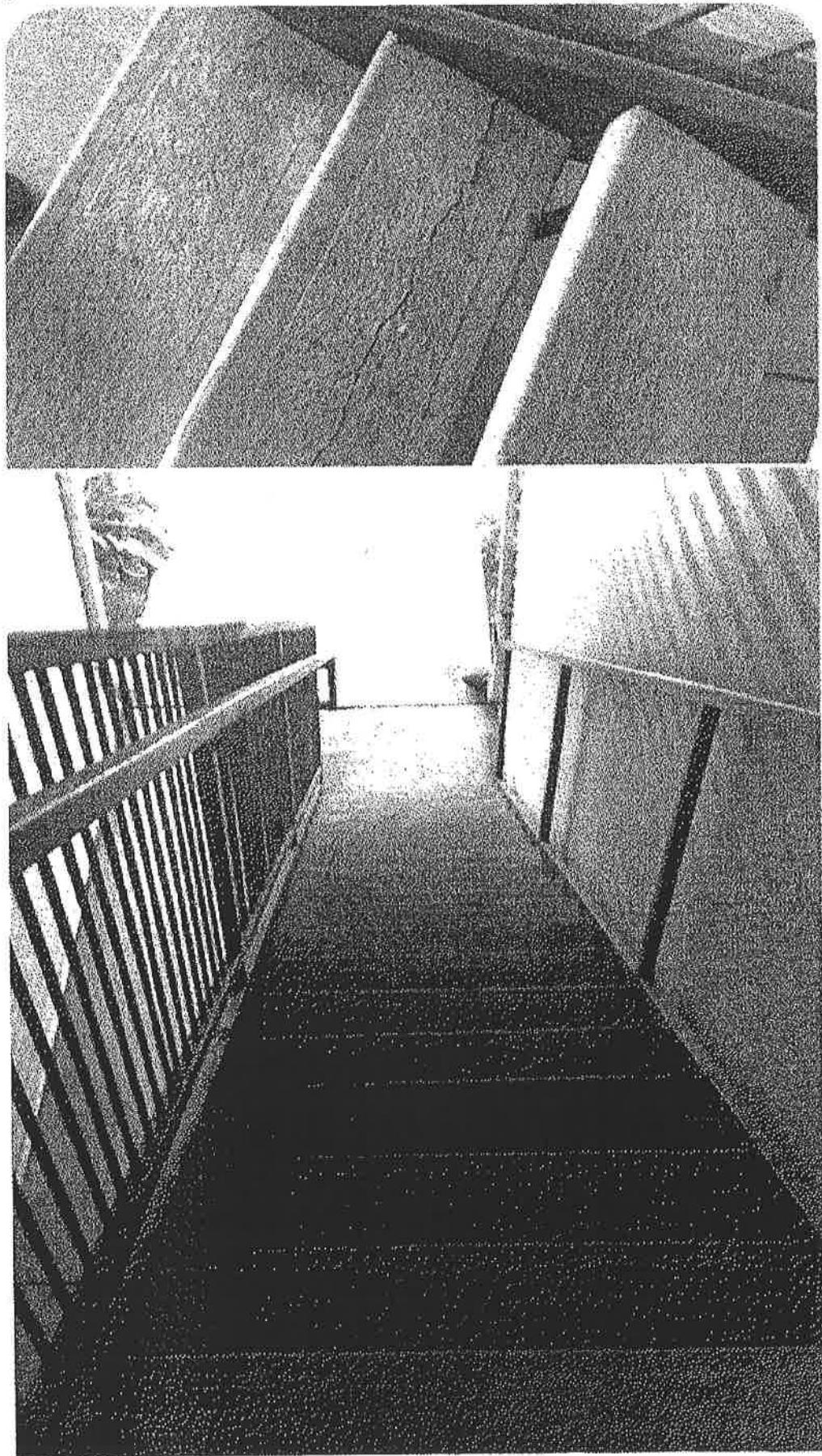
Attorney for Plaintiff

Subscribed and sworn to before me this 25 day of August, 2015.



Karen S. Wallace
Notary Public

Exhibit "A"



Today 3:05 PM

